

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

FACTORY MUTUAL INSURANCE  
COMPANY, AS SUBROGEE OF Agilent  
Technologies, Inc.,

Plaintiff,

V.

XPEDIENT MANAGEMENT GROUP, LLC  
and ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY,

Defendants.

No. 2:25-cv-02424

Judge Thomas L. Parker

Magistrate Judge Tu M. Pham

XPEDIENT MANAGEMENT GROUP, LLC  
and ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY,

Defendants.

XPEDIENT MANAGEMENT GROUP, LLC  
and ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY,

Defendants.

Defendants.

**ST. PAUL FIRE AND MARINE INSURANCE COMPANY'S**  
**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Civil Procedure Rule 7.1, St. Paul Fire and Marine Insurance Company submits to the Court that it is wholly owned by its parent company, The Travelers Companies, Inc., which is a publicly held corporation.

Respectfully submitted,

/s/ Paige I. Bernick

Paige I. Bernick, Esq. (BPR # 30071)

Peter C. Robison, Esq. (BPR # 27498)

Ryan N. Clark, Esq. (BPR # 29105)

LEWIS THOMASON, P.C.

424 Church Street, Suite 2500

Nashville, TN 37219

pbernick@lewisthomason.com

[probison@lewisthomason.com](mailto:probison@lewisthomason.com)

[rclark@lewisthomason.com](mailto:rclark@lewisthomason.com)

Telephone: (615) 259-1366

*Attorneys for Defendant St. Paul Fire and  
Marine Insurance Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of April, 2025, a copy of the foregoing ST. PAUL FIRE AND MARINE INSURANCE COMPANY'S CORPORATE DISCLOSURE STATEMENT was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail and email. Parties may access this filing through the Court's electronic filing system.

S. Joe Welborn, Esq.  
Jefferson C. Orr, Esq.  
Brenden T. Holbrook, Esq.  
Smith Cashion & Orr, PLC  
3100 West End Avenue  
Suite 800, One American Center  
Nashville, TN 37203  
(615) 742-8565  
[jwelborn@smithcashion.com](mailto:jwelborn@smithcashion.com)  
[jorr@smithcashion.com](mailto:jorr@smithcashion.com)  
[bholbrook@smithcashion.com](mailto:bholbrook@smithcashion.com)

/s/ Paige I. Bernick